

ASSOCIATION  
OF BAY AREA  
GOVERNMENTS  
ABAGENVIRONMENTAL  
MANAGEMENT  
PROGRAM

DT: November 2, 1976

TO: Environmental Management Task Force

FM: Staff

RE: REVISED ASSESSMENT CRITERIA

Attachment 6.1 is the revised list of "Assessment Criteria" for consideration and approval of the EMTF. The revisions to the list (presented at the last EMTF meeting) were made in response to comments and suggestions received from the Planning Procedures Committee, the County Roundtables and the Assessment Advisory Committee. The criteria are the important factors to consider when choosing among alternative pollution control measures.

Assessment criteria categories were considered and approved by the Planning Procedures Committee in August. Staff then developed criteria within the approved categories for discussion at the eight County Roundtables in late September and early October. The list was also considered by the Assessment Advisory Committee at its October meeting. Comments have been compiled, considered and are now reflected in the current list.

For your information, we have also attached summaries and staff response to citizen comments received at the County Roundtables (attachment 6.2) and the Assessment Advisory Committee (attachment 6.3). All summaries and the adopted criteria list will be sent to all participants in those forums.

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ASSESSMENT CHECKLIST

## I. ENVIRONMENTAL CRITERIA

A. Air Quality

## 1. Federal standards for air quality

- Total suspended particulates
- Carbon monoxide
- Photochemical oxidants
- Hydrocarbons
- Sulfur dioxide
- Nitrogen dioxide

## 2. State standards for air quality

- Lead
- Sulfate
- Hydrogen sulfide
- Ethylene
- Visibility reducing particulates

## 3. Other air quality considerations

- Ozone depletion
- Odor

B. Surface and Ground Water Quality and Quantity

## 1. Effect on beneficial uses

- Municipal and domestic supply
- Agricultural supply
- Industrial process supply
- Industrial service supply
- Groundwater recharge



- Freshwater replenishment
  - Navigation
  - Hydropower generation
  - Water contact recreation
  - Non-contact water recreation
  - Ocean commercial and sport fishing
  - Warm freshwater habitat
  - Cold freshwater habitat
  - Preservation of areas of special biological significance
  - Saline water habitat
  - Wildlife habitat
  - Preservation of rare and endangered species
  - Marine habitat
  - Fish migration
  - Fish spawning
  - Shellfish harvesting
2. Water quality objectives have been set forth in the Basin Plan (Water Quality Control Plan, San Francisco Bay Basin) to protect the beneficial uses of surface and ground waters. These objectives have been accepted by State and Federal agencies. The assessment process will involve the estimation of the effects of alternative environmental management strategies with respect to these water quality objectives and other policies.
3. The assessment process will also involve the estimation of mass emission rates of pollutants. These emissions will include:
- Organic material
  - Nutrients
  - Sediments and other suspended solids
  - Disease causing organisms

- Floating material
  - Heat
  - Radioactivity
  - Heavy metals and other toxicants
  - Chemical constituents
4. Effect on surface and ground water quantity
- Impact on surface water supplies and requirements for water importation
  - Impact on groundwater table
    - Changes in safe yield
    - Subsidence

C. Physical Resources

1. Effect on flora and fauna
- Impacts on desirable, unusual, rare, or endangered species
  - Impact on plant species which provide cover and food for important wildlife species
  - Effects upon noxious species of plants or animals
2. Effect on the supply of critical land-related resources
- Impact on prime or unique agricultural lands
  - Impact on other agricultural lands
  - Impact on mines, quarries, and mineral-bearing lands.
  - Impact on timber-producing and other forested lands
  - Impact on salt ponds
  - Impact on geothermal sites
  - Impact on wet lands, marshes, coastal zones, and estuaries
  - Impact on wildlife habitat
  - Impact on hilly land, fragile land, or land subject to erosion



3. Effect on land sites with special development characteristics
  - Effects upon lands uniquely suited for seaport, airport, marina, or energy site development
4. Effect on recreation use or potential
  - Impact on actual or potential recreation sites (e.g., parks, beaches, stadia, etc.)
  - Impact on recreation use
5. Effect on solid waste
  - Impact on solid waste volume
  - Impact on resource recovery
  - Impact on hazardous materials

D. Energy

1. Effect on energy consumption/demand
  - Impact on natural gas consumption
  - Impact on electricity consumption
  - Impact on petroleum consumption
  - Impact on coal or other non-renewable energy resource consumption
2. Effect on energy conservation/supply
  - Impact on efficiency in the use of energy
  - Impact on energy use
    - Peak energy use
    - Off-peak energy use
  - Impact on resource recovery and recycling
  - Impact on energy production as a by-product of residuals management
  - Impact on solar energy production

## E. Amenities

### 1. Effect on visual amenities

- Preservation of scenic areas, the natural state of the environment, and open space.
- Height and bulk of structures required for or affected by the plan
- Visibility impact of clean air
- Appearance of urban landscape

### 2. Effect on historic and cultural resources

- Impact on historic landmarks, monuments, districts, archaeological sites, and other areas of historic or cultural significance
- Impact on sites with special water-related historical significance

### 3. Effect on noise

- Impact and location of transportation noise
- Impact and location of construction noise
- Special noise problems due to pollution reduction activity (e.g., trash collection, street sweeping)

### 4. Effect on odor

- Impact on type, strength, location and duration of odors

## II. INSTITUTIONAL AND FINANCIAL CRITERIA

### A. Financial

#### 1. Direct costs of implementation

- Capital and replacement costs
- Operating/maintenance costs
- Administrative costs
- Costs of regulation, inspection, and enforcement

2. Fiscal effects on local government (assuming constant levels of State or Federal assistance)

- Impact on general obligations, revenue or special assessment bonds and bonding capacity
- Impact on property tax base
- Impact on property tax rate
- Impact on sales and other taxes
- Impact on fees, licenses, and other user charges
- Impact on connection and stand-by charges
- Impact on Federal and State grant subvention funding dependence and eligibility
- Impact on interest earnings and cash revenues

B. Institutional

1. Impact on the provision of public services

- Type, level, and displacement of public service (e.g., police, fire, sewerage, etc.)

2. Effect on public agencies

- Impact on intergovernmental responsibility and coordination

3. Implementability

- Public acceptability
- Organizational and political feasibility
- Legal capability
- Impact on existing plans, regulations, and policies
- Complexity or simplicity of control measures and their implementation

4. Flexibility

- Reversability of decision



### III. ECONOMIC CRITERIA

#### A. Production of goods and services

1. Effect on industrial, commercial, agricultural, and service activity by categories (e.g., manufacturing, construction, transportation, etc.)
2. Effect on employment, unemployment, and underemployment
  - Impact on job creation and elimination by categories (e.g., professional, technical, crafts, etc.)

#### B. Income and investment

1. Effect on wages and salaries
2. Effect on rents
3. Effect on capital investment for new and replacement facilities or equipment
4. Effect on profits

#### C. Consumer expenditures

1. Effect on the prices of goods and services
2. Effect on consumption of goods and services

### IV. SOCIAL CRITERIA

#### A. Housing Supply

1. Effect on existing housing stock
  - Impact on the removal of housing by demolition or conversion
  - Impact on housing quality
  - Impact on the cost of housing and rent
  - Impact on the cost of housing rehabilitation & maintenance

2. Effect on new housing stock

- Impact on the cost of new housing
  - Cost of land
  - Cost of site preparation
  - Cost of construction
- Impact on supply of new housing
  - Quantity of new units produced
  - Proximity to employment opportunities

B. Physical Mobility

1. Impact on public transportation

- Cost
- Time
- Convenience
- Purpose of trip

2. Impact on private transportation

- Cost
- Time
- Convenience
- Purpose of trip

C. Health and Safety

1. Effect on site hazards

- Impact on seismic safety and risk
- Impact on flood plain safety and flood risk

2. Effect on transportation conflicts

3. Effect on public health

D. Sense of Community

1. Effect on community character
2. Effect on community stability

E. Equity

1. Impact on individual opportunity and lifestyle
2. Impact on special population groups
  - Aged
  - Youth
  - Ethnic Minorities
  - Women
  - Low-income
  - Handicapped people
  - Individuals with special employment problems

F. Urban Patterns

1. Location of development
2. Density of development
3. Type of development
4. Timing of development





COMMENTS FROM COUNTY ROUNDTABLES ON THE  
CRITERIA FOR JUDGING PLAN RECOMMENDATIONS

COMMENTS FROM PUBLIC

Air Quality

Air quality assessment should consider the effect of air pollution on public health.  
(Alameda, Contra Costa, Marin, San Mateo, Santa Clara, Solano, Sonoma)

Assessments should consider the effect of reducing auto dependence.  
(Alameda, Marin, Napa, Santa Clara, Solano)

Air quality assessments should consider the location of the air pollution and its effect on other areas.  
(Alameda, Contra Costa, San Mateo, Santa Clara, Solano)

Assessments should estimate the cumulative effect of air pollution from existing plants.  
(Solano)

The impact of depletion of the ozone layer should be assessed.  
(Santa Clara)

Assessments should estimate the affect of transportation system changes on regional air quality.  
(Alameda, Marin, Napa, San Mateo, Santa Clara, Solano)

RESPONSES BY STAFF

Air quality standards as set by Federal and State governments are based on the health effects of air pollution. The air quality assessment will consider public health to the maximum extent feasible.

Several of the preliminary air quality maintenance control measures are designed to test the effects of reduced auto use.

Agree. The location of air pollution and its effect on contiguous areas will be considered as part of the air quality assessment.

Agree. The cumulative effect of air pollution from existing plants will be measured in the emissions inventory and will be considered as a base for all air quality assessments.

Analysis of this particular concern is outside the scope of the Air Quality Maintenance Program.

Agree. One of the air quality maintenance control measures currently being considered is the encouragement of alternative means of transportation. The assessment of this control measure will provide data on impacts of transportation system changes.

COMMENTS FROM PUBLIC

Water Quality

Assessment should consider the effect of development or protection of non-publicly owned watersheds which are used for domestic water supply.  
(Marin)

The impact of control measures on fishing and shell fishing must be considered.  
(Alameda, Contra Costa, Marin, Santa Clara)

Marsh habitats should be protected.  
(Santa Clara, Solano)

The impact of control measures on groundwater should be assessed.  
(Napa)

The impact of water conservation on domestic water supply must be assessed.  
(Alameda, Marin, Napa, San Mateo, Santa Clara, Sonoma)

Assessments should include the effect of controls on domestic water quality.  
(Alameda, Marin, Santa Clara)

Assessments should include the effect of controls on domestic water quality.  
(Alameda, Marin, Santa Clara)

Environmental assessment should consider the ecological balance of the Bay.  
(San Mateo)

RESPONSES BY STAFF

Agree. An important criteria of assessment will be effect on domestic water supply. Several watersheds have been specifically selected to consider this problem. In addition, the non-point source controls will consider the effect of septic tanks and other domestic waste treatment methods on municipal and domestic water quality.

Agree. Several assessment criteria are designed to estimate this impact. Specifically the beneficial use categories concerning fresh and saline water habitats, marine habitats, fish migration, fish spawning, and shellfish harvesting.

A criterion designed to consider the effect of controls on marshes and wetlands will be added.

Agree. Assessment criteria concerning groundwater recharge and groundwater table will consider both groundwater quality and quantity impacts.

Agree. Criteria to consider this impact will be included in the assessment.

Agree. Criteria designed to test the effects of controls on municipal and domestic water quality will be included in the assessment process.

Agree. Criteria designed to test the effects of controls on municipal and domestic water quality will be included in the assessment process.

Agree. The ecological balance of the Bay is the main concern of the Surface Runoff Management Plan. This plan, and the other environmental management plans, will provide data for monitoring effects on the Bay's ecological balance.



COMMENTS FROM PUBLIC

Water Quality (continued)

The effect of top soil retention measures on sediments should be assessed.

(Alameda, Marin, Napa, Santa Clara, Sonoma)

Efforts should be made to reduce the amount of impervious surfaces in new and existing development.

(Alameda, Marin, Napa)

RESPONSES BY STAFF

Agree. The impact of soil retention measures on sediment will be included in the control measures which are considered in the Surface Runoff Management Plan.

Agree. Several control measures currently being considered as part of the Surface Runoff Management Plan will incorporate restrictions or reductions on the amount of impervious surfaces in urban areas.

## COMMENTS FROM PUBLIC

### Physical Resources

The impact of control measures on endangered plants and animals should be assessed.  
(Marin, Santa Clara)

Natural resources should be protected.  
(Alameda, Marin, Solano)

Alternative plans should be assessed for their effect on open space.  
(Alameda, Contra Costa, Marin, Solano, Sonoma)

The effect of controls on agricultural lands should be assessed.  
(Alameda, Contra Costa, Napa, San Mateo, Solano)

## RESPONSES BY STAFF

Agree. Existing assessment criteria require that assessments attempt to measure the impact of controls on desirable, unusual, rare, or endangered species.

The assessment process will include the consideration of the effect of control measures on natural resources. Basically assessments will be limited to measuring the effects. The desirability of protecting natural resources is an evaluation decision that will be made as part of the political process.

An open space criterion will be included.

Agree. The effects of controls on both prime agricultural land and other agricultural (grazing) land will be considered in the assessment process.

COMMENTS FROM PUBLIC

Energy

The use of solid waste for energy production and other purposes should be considered.  
(Alameda, Napa)

Variable metering rates to encourage reduced or off-peak energy use should be considered.  
(Napa)

Assessments must include the impacts of controls on energy efficiency.  
(Alameda, Napa)

The effect of controls on geothermal sites should be assessed.  
(Napa)

The effect of controls on energy should be assessed.  
(Alameda, Contra Costa, Marin, Napa, Santa Clara, Solano, Sonoma)

Recycling should be encouraged.  
(Alameda, Marin, Napa, San Mateo, Solano, Sonoma)

Assessments should estimate the effect of transportation system changes on energy consumption and energy efficiency.  
(Alameda, Napa, San Mateo, Solano)

RESPONSES BY STAFF

Agree. Criteria will be included which are designed to consider the effect of resource conservation and residuals management on energy production. However, the Solid Waste Management Program may not be able to fully explore this issue.

Controls being considered under the Air Quality Maintenance Program will include the assessment of energy conservation measures such as these.

Agree. A criterion to assess energy efficiency will be included.

Agree. This impact will be assessed.

Agree. The impact of controls on both energy supply and energy demand will be included in the assessment process.

Recycling and other resource conservation strategies are included in the list of control measures that will be assessed as part of the Solid Waste Management Program. Water recycling is considered in the Water Conservation and Reuse Program.

Agree. Transportation system changes are included in the preliminary list of air quality control measures. In addition, the assessment process will include a criterion to consider the impact of all control strategies on energy use efficiency.



COMMENTS FROM PUBLIC

Energy (continued)

The use of mass transit should be encouraged.  
(Marin, Napa, San Mateo)

Mass transit should be made more viable by providing for greater coordination between transit systems in the region, including single-ticket transit.  
(Marin)

RESPONSES BY STAFF

The effect of improved mass transit and alternative means of transportation will be considered as part of the assessment process. The evaluation process will then be able to determine whether mass transit use should be further encouraged.

Single-ticket transit and other strategies to improve transit service can be considered as part of the air quality maintenance control measures.

COMMENTS FROM PUBLIC

Amenities

Clean air should be included as a visual amenity.  
(Contra Costa, Sonoma)

Clean streets should be considered as a visual amenity.  
(Napa, Solano, Sonoma)

Assessment should include the effect of environmental controls on traffic generation and reduction, particularly stressing the effect of traffic congestion on noise levels.  
(Contra Costa)

RESPONSES BY STAFF

Agree. The visual impact of clean air will be included in the assessment criteria.

Agree. The visual impact of clean streets will be included in the list of assessment criteria.

Agree. The impact of transportation noises will be assessed.

## COMMENTS FROM PUBLIC

### Financial Criteria

Alternatives must be assessed to determine the total cost of implementation.

(Alameda, Contra Costa, Marin, Napa, San Mateo, Santa Clara, Solano, Sonoma)

The fiscal impact on city and county governments must be assessed. Assessments must include the effect of controls on local taxes, especially the property tax.

(Alameda, Contra Costa, Marin, Napa, San Mateo, Santa Clara, Sonoma)

Control measures should be assessed to determine their effect on the local tax base.

(San Mateo)

Impact of controls on sewer connection fees should be considered.

(Napa)

Alternative plans should be assessed for their effect on Federal grants.

(Alameda)

The cost of doing nothing, or doing nothing more than is currently being done, should be considered.

(San Mateo, Santa Clara)

## RESPONSES BY STAFF

Agree. The methods used to measure implementation cost will consider all costs including the long-and short-term cost and which population groups will have to bear those costs.

Agree. The effect of controls on property tax as well as the impact on city and county fiscal resources will be included in the assessment process.

Agree. The effect on local tax base will be included under the financial criteria.

Agree. A comprehensive list of local fees and charges is being prepared and will be included as part of the assessment procedures.

The effect of alternative plans on Federal grant assistance levels and eligibility will be assessed.

This relates to the procedures that will be employed in the assessment process. The effects of doing nothing more than is currently committed to be done will be considered as a baseline against which other effects will be measured.



COMMENTS FROM PUBLIC

Institutional Criteria

Assessments should consider the use of sanctions to reduce pollution.  
(Santa Clara)

Assessments should attempt to determine which control strategy will be most effective. Alternatives should avoid control measures which will produce only marginal improvement in environmental quality.  
(Alameda, San Mateo, Solano)

The impact of controls on coordination between government agencies should be considered.  
(Alameda, Napa, San Mateo, Santa Clara, Solano)

Assessments should estimate the political acceptability of control strategies. Basically, environmental controls must be acceptable to local governments.  
(Alameda, Contra Costa, Marin, Napa, San Mateo, Sonoma)

The plan approval process should include local governments.  
(Marin, Santa Clara)

Based on past performance, there is little faith that government can effect environmental improvement.  
(Marin, Napa, Solano)

The assessment process must consider public acceptability.  
(Alameda, Contra Costa, Marin, Napa, San Mateo, Santa Clara, Solano, Sonoma)

RESPONSES BY STAFF

A number of the control measures may include sanctions as possible implementation strategies.

Effectiveness is an important part of the assessment process. Each control strategy will be assessed for effect on environmental quality. Decisions to use measures which produce only marginal improvement in environmental quality will be made as part of the evaluation process.

Agree. this will be included in the assessment process.

Agree. Political acceptability will be considered in the assessment criteria.

The procedures for plan approval are being developed by the Environmental Management Task Force.

Implementation feasibility will be included in the assessment criteria. The assessments will also consider the capability of local governments and special districts to implement specific and possibly complex control measures.

Agree. The public acceptability of control strategies will be specifically included in the assessment criteria.

COMMENTS FROM PUBLIC

Institutional Criteria (continued)

Control strategies must be assessed for their implementation feasibility. Each control measure should be assessed to see if "it can really work."

(Alameda, Contra Costa, Marin, Napa, San Mateo, Santa Clara, Solano, Sonoma)

RESPONSES BY STAFF

Agree. A criterion designed to consider the feasibility of effective implementation will be included.

COMMENTS FROM PUBLIC

Economic Criteria

Control measures should be assessed for their effect on employment.

(Alameda, Contra Costa, Marin, Napa, San Mateo, Santa Clara, Solano, Sonoma)

Assessments should consider the effect of controls on economic production and the effect on industry.

(Napa, San Mateo, Santa Clara, Solano, Sonoma)

Environmental control strategies should consider the use of economic incentives for the achievement of pollution reduction. This could entail the use of pricing mechanisms to encourage conservation.

(Marin, Santa Clara)

RESPONSES BY STAFF

Agree. The effect of controls on employment and unemployment will be included in the assessment criteria.

Agree. Criteria designed to assess the effect of controls on production and industry will be included.

Control strategies can incorporate economic incentives for pollution reduction or resource conservation. This concern will be considered as plan implementation procedures are designed.



## COMMENTS FROM PUBLIC

### Social Criteria

Control strategies which are environmentally sound should be assessed for their effect on other societal goals.  
(Santa Clara)

Assessment should include the effect of controls on the availability of housing.  
(Alameda, Napa, Santa Clara)

The effect of controls on housing location should be assessed.  
(Napa)

The impact of controls on housing cost should be considered.  
(Santa Clara)

Control measures should be assessed for their effect on housing supply.  
(Alameda, Napa)

Compact development of communities should be encouraged.  
(Alameda, Napa, Sonoma)

Intensive rather than extensive development is preferred. This could include neighborhood re-design.  
(Alameda)

The effect of controls on public safety and health should be assessed.  
(Marin, San Mateo, Solano)

## RESPONSES BY STAFF

Agree. The purpose of the entire social criteria category is to reflect all of the factors which a society considers to be important in assessing strategies for environmental improvement.

Agree. Housing availability depends on the quantity of housing available and the cost of that housing. Both impacts will be assessed.

Staff is presently developing criteria which will consider housing location and other development impacts

Agree. The cost of existing housing, including the cost of home rehabilitation and maintenance and the cost of constructing new housing will be included in the assessment criteria.

Agree. The effect of environmental controls on existing housing stock and new housing stock will be assessed.

The type of community development which may be preferred or encouraged in the future is a decision that must be made as part of the evaluation process. However, information on community development and other land use impacts resulting from the environmental controls will be included in the criteria.

Agree. Present assessment criteria consider the effect of controls on public safety resulting from sites hazards (e.g., earthquake zone or flood plain). Criteria to specifically consider the impact on public health will be developed.

## COMMENTS FROM PUBLIC

### Social Criteria (continued)

Assessments should include the effect of controls on the sense of community and neighborhoods.  
(Alameda, Contra Costa, San Mateo)

Controls should be assessed for their impact on private rights and responsibilities.  
(Contra Costa, San Mateo, Santa Clara)  
Individual lifestyle should be protected.  
(Contra Costa, Napa, Santa Clara, Solano, Sonoma)

The public should be able to identify with environmental problems and recognize the need for environmental control. This should probably include efforts toward public education on the environment.  
(Contra Costa, Marin, Napa, San Mateo, Santa Clara)

## RESPONSES BY STAFF

Agree. Controls will be assessed for their impact on the sense of community.

Agree. Criteria designed to consider the impact of control measures on individual lifestyles and private rights and responsibilities will be included.

Agree. The degree of public identification with environmental problems and control strategies will be assessed under the public acceptability criterion. Public education or other implementation measures can be considered by the Environmental Management Task Force.

## COMMENTS FROM PUBLIC

### Other Criteria

The time frame or planning range for the assessment is important. Controls should be assessed for their effect over time as well as the difference between long-term and short term effects.

(Contra Costa, Marin, San Mateo, Santa Clara, Solano Sonoma)

Future flexibility should be preserved. Alternatives should emphasize controls on pollution sources and other non-technical solutions. Future options should be preserved by stressing environmental control strategies that do not require a major investment in structures.

(Alameda, Marin, San Mateo, Santa Clara, Sonoma)

Simple control measures should be encouraged (e.g., anti-litter programs).

(Marin, Napa, Sonoma)

Impacts should be reassessed as technology makes new environmental control strategies possible or changes current practices (e.g., new mass transit technology).

(Napa, Santa Clara, Sonoma)

The data sensitivity of controls should be assessed. The degree to which success of a control measure is dependent on good data is important. The assessment should provide a solid basis for recommendation.

(Contra Costa, Marin, Sonoma)

Proven methods of environmental control should be used.

(Marin, San Mateo, Santa Clara, Solano)

## RESPONSES BY STAFF

This issue affects all assessments and should be considered when assessing the effects of controls on each criteria. The time frame of the analysis will be discussed and the preamble to the assessment criteria.

Agree. A flexibility criterion will be included in the assessment process.

A criterion to assess the complexity or simplicity of controls will be included. This will consider both the technological complexity of the controls and the difficulty of implementation.

Agree. The assessment/evaluation process will continue after plans have been developed and approved. The reassessment of impacts as technology makes new control strategies possible, will be an important part of a continuing assessment/evaluation process.

This idea can guide the development of procedures to assess the effect on each criteria. In addition, a specific criterion to assess the sensitivity of the assessment information to base data is being considered.

Information on the proven usefulness or effectiveness of environmental control measures will be provided when available. However, possible controls should not be eliminated from consideration before examination.



## COMMENTS FROM PUBLIC

### Other Criteria (continued)

The assessment process should provide data on the necessity of cleaning up the last small increment (5%) of pollution.  
(Alameda, Marin, Solano)

Assessments should demonstrate and prove the need for action.  
(Alameda, Marin, Napa, San Mateo)

The impact of control measures on growth-inducement or growth-control should be assessed. This should include both the timing and the magnitude of growth in order to curtail unmanaged growth and achieve population stabilization.  
(Alameda, Contra Costa, Napa, San Mateo, Santa Clara, Solano)

The impact of control measures on population should be assessed.  
(Alameda)

Assessments should attempt to determine the type and magnitude of unanticipated consequences, particularly the effect of environmentally beneficial control on other criteria such as energy conservation.  
(Alameda, Napa, San Mateo)

## RESPONSES BY STAFF

The assessment process will attempt to determine the incremental cost of each control measure. In this way, the cost of cleaning the last increment of pollution can be compared with the costs for other increments of that control measure or the cost for the last increment of other control measures. However, determination of necessity of cleaning the last increment of pollution is a decision that must be made in the evaluation process.

The assessment process will provide information on the potential effects of environmental control strategies. This information on potential effects will be organized according to the factors for criteria that are selected by the Environmental Management Task Force. On the basis of the assessment information the EMTF can evaluate the necessity for any action to improve environmental quality in the Bay Area.

Criteria to assess the impact of environmental controls on growth and development in the region are being developed.

The effect on population will be considered as part of the urban development criteria.

Agree. The purpose of the assessment process is to develop complete information on the potential impacts of environmental controls.

COMMENTS FROM PUBLIC

Other Criteria (continued)

Control strategies should be assessed for possible tradeoffs between criteria.  
(Alameda, Marin, San Mateo, Santa Clara)

The assessment process should attempt to achieve a balance between environmental goals.  
(Alameda, Marin, Santa Clara, Solano, Sonoma)

Alternatives should focus on built-in (small scale) solutions.  
(Marin, San Mateo)

The assessment process should include cost-benefit analysis of pollution.  
(Alameda, San Mateo, Santa Clara)

A reporting system should be developed between the Federal government and the public.  
(San Mateo)

A revision mechanism should be included in the assessment process.  
(San Mateo)

It is important to determine who decides which environmental control strategies will be used.  
(Alameda, Marin, San Mateo)

RESPONSES BY STAFF

The assessment criteria are designed to be complete and comprehensive so that the tradeoffs between criteria can be ascertained from the information developed. The decision on the importance of specific information or the actual trade-offs to be made, must be determined in the evaluation process.

The balance between environmental goals is the decision that must be made in the evaluation process. The assessment process should develop information on the potential effects of alternative strategies.

A criterion to assess implementation complexity will be included in the assessment criteria. It can be assumed that built-in or small-scale solutions would be less complex and thus more easily implemented. However, the selection of environmental control strategies must be made in the evaluation process.

While the best available information will be provided, the current state-of-the-art of cost-benefit analysis is not sufficiently developed to make a cost-benefit analysis of pollution feasible.

This recommendation will be forwarded to the Environment Protection Agency.

Agree. This will be included in the continuing assessment/evaluation process.

The plan adoption process is currently being determined by the Environmental Management Task Force.

COMMENTS FROM PLANNING PROCEDURES COMMITTEE  
AND ASSESSMENT ADVISORY COMMITTEE ON THE  
CRITERIA FOR JUDGING PLAN RECOMMENDATIONS

COMMENTS FROM COMMITTEES

Air Quality

Assessments should give consideration to established local emission regulations (e.g., BAAPCD standards on odors).

Physical Resources

Assessments should consider the importance of preserving agricultural land.

Assessment of the impact on physical resources should include the effect of control measures on wetlands, scenic areas, and energy resources.

Energy

The impact on off-peak energy use is important but the peak energy use is of much greater importance because it dictates generating capacity and new energy development requirements.

The effect of controls on diesel fuel for trucks and fuel oil for heating should be included.

RESPONSES BY STAFF

Local emission regulations determine the base air quality conditions in the Bay Area. The Air Quality Maintenance Program will consider local standards when assessing the impact of control measures. However, the focus of the program will be on additions to these established local regulations.

The impact of control measures on prime agricultural lands and other agricultural lands will be included in the assessment criteria.

Agree. These concerns will be included in the assessment criteria.

Agree. The impact of controls on peak energy demand will be included in the assessment criteria.

Agree. Existing criteria will be expanded to include the impact of controls on all petroleum products.



COMMENTS FROM COMMITTEES

Amenities

The impact of control measures on odors should consider the duration of the odor.

Financial Criteria

The fiscal affects of control measures on local government should be assessed.

Assessments should include the impact of controls on property tax base and property tax rate. This should include assessing the impact of industrial productivity on the tax base.

Maintenance of the property tax base should be favored.

The impact of control measures on property owners should be considered.

Assessments should not only measure the cost at the time of implementation but also the present value cost of controls over long-term (e.g., 20 years).

The length of time required for implementation should be considered.

Assessment of implementation costs should include indirect costs such as pension expenses.

RESPONSES BY STAFF

Agree. The duration of the odor will be included in the assessment criteria.

Agree. This factor will be included as part of several criteria.

Agree. These concerns will be included in the assessment criteria. The assessment procedures will be developed to include consideration of the effect of industrial productivity on the property tax base.

The assessment process will develop information regarding the impact of control measures on the property tax base. The choice of controls which maintain the property tax base is part of the evaluation process.

The assessment criteria will include consideration of the impact of controls on property and property taxes. Wherever possible, the fiscal impacts of control strategies will be expressed in terms of the cost to an individual family.

The procedures for estimating all impacts will involve the use of a consistent time-frame so that short-term as well as long-term costs will be considered.

Agree. Implementation time requirements can have significant impact on the results of the assessment process. This comment will be kept in mind as all assessment procedures are developed.

Agree. All operating administrative and enforcement costs will include the indirect cost of control measure implementation.

## Institutional Criteria

Political acceptability should be assessed. Assessment should include the affect on the growing impatience with regulations and rules per se.

The potential effectiveness of enforcement should be assessed. Effective implementation can spell the difference between success and failure of the control strategy.

A category on effectiveness should be added. Criteria under this category should include public support, political acceptance, implementability, flexibility, reliability of the data on which recommendations are based, reversibility of the control measure.

Political criteria should be considered. Political considerations will affect all seven of the management plan, especially the actual implementation of those plans.

The impact of control strategies on adopted plans and policies should be assessed. This assessment should include the effect on general plan, zoning ordinances, and capital outlay programs.

Controls should be assessed for their compatibility with existing jurisdictional structures.

The flexibility of control strategies should be considered. This includes the non-reversibility of the action. Assessments should include whether implementation of the control measure precludes future options or if action is deferred can a control measure be instituted later.

The political acceptability of control strategies will be assessed as part of public acceptability and political feasibility. Public impatience with rules and regulations will be included in the assessment of the public acceptability criteria.

Criteria will be added which are designed to assess the ability of governmental units to implement control strategies. These criteria will include the legal capability of the jurisdiction, the complexity of the controls, the feasibility of implementation, and the impact on existing plans and policies.

Several criteria will be included to address these concerns. Public support and political acceptance will be included in the assessment of public acceptability and political feasibility. The criteria to assess the flexibility and reversibility control strategies will be added. The reliability of the data on which recommendations are based is an issue which affects all criteria, and the assessment of each criteria should include information on the reliability of the data.

Agree. The political and organizational feasibility of control measure implementation will be included in the assessment.

Agree. The impact of controls on existing plans, regulations, and policies will be included in the assessment criteria.

Agree. The impact of controls on intergovernmental responsibility and coordination will be included in the assessment criteria.

Agree. Flexibility criteria will be included. A criterion to consider the reversibility of the actions will be added.

## COMMENTS FROM COMMITTEES

### Economic Criteria

The effect of controls on productivity should be assessed.

The production of jobs should be a priority, particularly in the depressed construction industry.

### Growth

The growth-inducement impact of controls should be included in the assessment. The indirect impact of control measures on growth, that would either be facilitated or made more acceptable by implementation of the environmental controls should be assessed.

The regional growth effects of controls should be considered. This should include the possible limitation of new industries as well as impact of controls on the desirability of the San Francisco Bay Area as a location for new firms.

## RESPONSES BY STAFF

Agree. The assessment process will include the impact of controls on industrial, commercial, agricultural and service productivity.

The impact of control strategies on employment and unemployment will be considered. Employment will be examined by category so that the impact on jobs in particular professions or industries can be assessed.

Agree. Criteria will be included to consider the impact of environmental control strategies on urban patterns and growth in the region. Specific criteria will include the location, density, type, and timing of development.

The impact of controls on regional growth and industrial expansion or limitation will be included in the assessment of the impacts on urban development.



## Social Criteria

Assessments should include the effect on "the sense of freedom of choice."

Employment/unemployment and job opportunities should be included as a criterion in the social category. Assessment of these impacts would include the effect of controls on underemployment, the availability of jobs near housing opportunities, the impact on land development opportunities as a way to create new jobs.

Assessments should consider the impact on affirmative action programs.

Social impacts should include the impact on social service needs and the need for employment re-training.

Social assessment criteria should include a section which gives special consideration for low-income and minority peoples.

The impact of environmental controls on human health should be assessed. This assessment should estimate the effect of controls on respiratory diseases and carcinogens.

The effect of controls on land use and patterns of urban development and natural landscapes should be assessed. The effect of controls on conflicting or incompatible land uses should be assessed, as well as the effect on existing land uses.

Agree. This will be included in the assessment of the effect of controls on individual opportunity and lifestyle.

The impact of environmental control strategies on unemployment and underemployment as well as job opportunities are considered as part of the economic criteria category. The social criteria will be changed to include consideration of the location of both residential and industrial development and the proximity of housing to job opportunities.

The impact of controls on identifiable population groups will be assessed as part of the equity criteria. The specific population groups include those usually considered in affirmative action programs.

Agree. The impact of controls on public services will be included in the assessment. Assessment of the employment effects of control strategies will include identification of employment and unemployment by job category.

Agree. This will be included under the equity criteria.

Agree. Existing air quality and water quality criteria are based largely on the health effects of pollution. In addition, a public health criterion will be included in the assessment.

Agree. Urban pattern criteria will be included in the assessment. The assessment process will also identify conflicts with existing plans and policies.



## COMMENTS FROM COMMITTEES

### Social Criteria (continued)

The impact of land use controls on public mobility should be assessed.

Assessments should include the impact on lifestyles.

### Housing

A major area of concern should be the impact on housing availability and supply.

The effect of controls on the cost of new and "used" housing should be assessed. Assessments should also include the affect on rent as an impact on housing costs.

The location of housing vis-a-vis employment centers should be considered.

Housing criteria should also consider the impact on housing rehabilitation and maintenance.

### Physical Mobility

The physical mobility criteria should include a section which considers specifically the transportation/employment impact of controls.

The impact of the transportation system on the ability of people, especially poor people, to gain access to jobs should be considered.

## RESPONSES BY STAFF

Agree. Urban pattern criteria will include several factors which relate transportation and land use considerations.

Agree. This criteria will be included.

Agree. Housing availability depends on both the quantity of housing and the cost of that housing. The impact of control measures on both of these factors will be assessed.

The cost of both new and used housing will be included in the assessment criteria. This cost will consider the effect on rent payments.

Agree. The proximity of housing to employment opportunities will be included in the assessment criteria.

Agree. Housing rehabilitation and maintenance cost factors will be included in the assessment criteria.

Agree. Physical mobility criteria have been amended to include consideration of the purpose of each trip. The intent is to identify and give special consideration to the transportation/employment impact of control strategies.

The impact of environmental control strategies on special population groups (e.g., low income people) will be included in the assessment criteria. Criteria will also be included to consider the impact of transportation and housing location on job opportunities.



## COMMENTS FROM PUBLIC

### Equity

The assessments should include the impact of changing development priorities and practices on low-income and minority people.

Assessments should consider who pays for the control measures.

### General Comments

The basic criteria should be the greatest good for the greatest number.

The economic and social criteria categories should be combined.

## RESPONSES BY STAFF

Agree. These concerns will be specifically addressed in the equity criteria.

Agree. The impact of environmental control measures on taxes will be considered as part of the financial criteria. The impact of these implementation costs on special population groups (e.g., low income people) will be assessed under the equity criteria.

This comment will certainly be considered during the evaluation process.

The assessment criteria are listed in four categories for organization purposes. Several of the criteria are inter-related or seem to overlap. These relationships will be identified in the assessment procedures.

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